

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF

RAHUL MANCHANDA

INDEX NO. 16-10222-JLG

NOTICE OF MOTION
FOR CONTEMPT AGAINST
BRIGITTE BECQUET OF
SERVCORP INC.

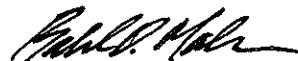
PLEASE TAKE NOTICE that upon the annexed affirmation of Rahul Manchanda duly affirmed the 1st day of February 2016, the annexed Memorandum of Law, and all the Pleadings and Proceedings heretofore had herein, the Undersigned will move this Honorable Court on February 9, 2016 at 9 AM at US SDNY Bankruptcy Court, 1 Bowling Green, New York, New York 10006 or as soon as thereafter as Counsel can be heard for an order holding Brigitte Becquet of ServCorp Inc. in Civil and Criminal Contempt of Court pursuant to US Federal Bankruptcy Law and the following:

1. On the grounds that Brigitte Becquet continues to willfully fail to comply with the Automatic Stay and Protection of this Honorable Court by threatening, harassing, collecting, terminating, and otherwise violating federal bankruptcy protection,
2. On the grounds that even though Brigitte Becquet received Notice of Chapter 13 Bankruptcy Filing on January 29, 2016 in this case, Brigitte Becquet abruptly and without warning terminated Debtor's law office services agreement on January 29, 2016 which was 2 days before the agreement was set to expire on January 31, 2016, even though the agreement requires one month of notice, and where she had previously in writing promised to renew Debtor's office service agreement in exchange for a marked reduction in Debtor's bill stemming from her previous fraudulent and false billing statements, and Debtor's withdrawing his previously filed racial discrimination complaint against her with the NYS Division of Human Rights ("NYSDHR") in complaint number 10179302, because she considered his duly filed complaint with the NYSDHR to be "harassment," even though the allegations therein are considered protected and privileged claims;
3. Brigitte Becquet, in addition to abruptly and without warning

terminating Debtor's office agreement, continues to illegally withhold his important lawyer mail, court correspondence, bar him from meeting with his clients, and other behavior worthy of a contempt finding.

4. Based on the above, the NYSDHR has now advised Debtor that it intends to fully go forward against Brigitte Becquet in the underlying original complaint, and has also now advised Debtor to file another complaint against Brigitte Becquet for Retaliation, which is also against the New York State Human Rights Law;
5. On the grounds that nothing less than a fine and incarceration will persuade Brigitte Becquet to comply with this Honorable Court's Automatic Stay and Protection from her threatening, harassing, collecting, terminating, fraudulent, and otherwise violating disregard for federal bankruptcy protection;
6. On the grounds that if Brigitte Becquet is not forced to comply with this Honorable Court's Automatic Stay and Protection from threatening, harassing, collecting, terminating, and otherwise violating disregard for federal bankruptcy protection, Brigitte Becquet will have reduced federal bankruptcy protection to a shambles;
7. On the grounds that Brigitte Becquet's willful and intentional noncompliance with the Automatic Stay and Protection prohibiting her threatening, harassing, collecting, terminating, and otherwise violating disregard for federal bankruptcy protection of this Honorable Court have defeated, impaired, impeded and prejudiced Debtor's rights;
8. for such other further relief as this Honorable Court deems just and proper, including contempt, costs, and sanctions against Brigitte Becquet for violation of the US Federal Bankruptcy Law and the FDCPA, and in light of the information contained herein.

Dated: February 1, 2016
New York, NY



Rahul Manchanda, Esq.
82 Beaver Street Apt 301
New York, NY 10005
Tel: (212) 968-8600
Fax: (212) 968-8601

To: Brigitte Becquet
ServCorp Inc
17 State Street, Suite 4000
New York, NY 10004

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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STATE OF NEW YORK } :
COUNTY OF NEW YORK } ss

RAHUL MANCHANDA, an Attorney duly licensed to practice law in the State of New York, affirms the following to be true under penalty of perjury:

1. I make this Affirmation in support of this Motion for Contempt of Court against Brigitte Becquet in all respects based upon my personal knowledge of the facts and experiences I relate herein and based upon information and belief, based on the contents of the file.
2. On the grounds that Brigitte Becquet continues to willfully fail to comply with the Automatic Stay and Protection of this Honorable Court by threatening, harassing, collecting, terminating, and otherwise violating federal bankruptcy protection,
3. On the grounds that even though Brigitte Becquet received Notice of Chapter 13 Bankruptcy Filing on January 29, 2016 in this case, Brigitte Becquet abruptly and without warning terminated Debtor's law office services agreement on January 29, 2016 which was 2 days before the agreement was set to expire on January 31, 2016, even though the agreement requires one month of notice, and where she had previously in writing promised to renew Debtor's office service agreement in exchange for a marked reduction in Debtor's bill stemming from her previous fraudulent and false billing statements, and Debtor's withdrawing his previously filed racial discrimination complaint against her with the NYS Division of Human Rights ("NYSDHR") in complaint number 10179302, because she considered his duly filed complaint with the NYSDHR to be "harassment," even though the allegations therein are

considered protected and privileged claims;

4. Brigitte Becquet, in addition to abruptly and without warning terminating Debtor's office agreement, continues to illegally withhold his important lawyer mail, court correspondence, bar him from meeting with his clients, and other behavior worthy of a contempt finding.
5. Based on the above, the NYSDHR has now advised Debtor that it intends to fully go forward against Brigitte Becquet in the underlying original complaint, and has also now advised Debtor to file another complaint against Brigitte Becquet for Retaliation, which is also against the New York State Human Rights Law;
6. On the grounds that nothing less than a fine and incarceration will persuade Brigitte Becquet to comply with this Honorable Court's Automatic Stay and Protection from her threatening, harassing, collecting, terminating, fraudulent, and otherwise violating disregard for federal bankruptcy protection;
7. On the grounds that if Brigitte Becquet is not forced to comply with this Honorable Court's Automatic Stay and Protection from threatening, harassing, collecting, terminating, and otherwise violating disregard for federal bankruptcy protection, Brigitte Becquet will have reduced federal bankruptcy protection to a shambles;
8. On the grounds that Brigitte Becquet's willful and intentional noncompliance with the Automatic Stay and Protection prohibiting her threatening, harassing, collecting, terminating, and otherwise violating disregard for federal bankruptcy protection of this Honorable Court have defeated, impaired, impeded and prejudiced Debtor's rights;
9. for such other further relief as this Honorable Court deems just and proper, including contempt, costs, and sanctions against Brigitte Becquet for violation of the US Federal Bankruptcy Law and the FDCPA, and in light of the information contained herein;

WHEREFORE, it is respectfully requested that this Motion be granted in all respects together with such other and further relief as this Honorable Court deems to be just and proper, including contempt, costs, incarceration, and sanctions against Brigitte Becquet for continuing to willfully fail to comply with the Automatic Stay and Protection of this Honorable Court by threatening, harassing, collecting, terminating, and otherwise violating disregard for federal bankruptcy protection, in violation of US Federal bankruptcy Law and the FDCPA, and in light of the information

contained herein.

Dated: February 1, 2016
New York, NY



Rahul Manchanda

CERTIFICATE OF SERVICE

On February 1, 2016, I, Rahul Manchanda, served a copy of this Motion for Contempt of Court and any attached pages to Brigitte Becquet located at ServCorp, 17 State Street, Suite 4000, New York NY 10004 via US Mail.



By: Rahul Manchanda, Esq.
82 Beaver Street, Apt 301
New York, New York 10005
Tel: (212) 968-8600
Fax: (212) 968-8601

To: Brigitte Becquet
ServCorp Inc.
17 State Street, Suite 4000
New York NY 10004

As the attached emails detail, Brigitte Becquet of ServCorp illegally and unlawfully retaliated against me and my law office business simply because I filed a complaint with the NYS Division of Human Rights, which is considered a crime separate and apart from the underlying complaint itself in Docket 10179302.

Specifically, Brigitte Becquet has now decided to retaliate against me for filing said complaint, and has decided to not renew my lease service agreement as promised as a condition for settlement, and is clearly in violation of the NYSDHR rules and regulations.

Please see the attached email from Brigitte Becquet wherein she transparently tried to state that she is terminating my service agreement, even before my lease term ends, because my complaints were "harassing" her."

Clearly complaints, allegations, and claims within civil complaints in the purview of the NYS Division of Human Rights, NY Attorney General, and the NY Civil Courts are privileged and protected communications, and not personal or *ad hominem* in nature.

Please act quickly to protect my rights, as she is now interfering with my mail delivery, access to clients and facilities, and ultimately my entire business. I also have a bankruptcy stay Chapter 13 case in place, docket no 16-10222-JLG, which she is clearly violating and this will also invite a Motion for Contempt requesting civil and criminal sanctions against her.

What Brigitte Becquet has done to me is nothing short of an emergency.

She has effectively closed my law office practice arbitrarily and has pushed me to bankruptcy in Chapter 13.

Please immediately get involved to save my life from this psychotic dishonest woman.

I don't have anytime to waste as this crystal clear retaliation from her will destroy me and my family.

Furthermore I have invested a fortune into that address on the internet and all my legal correspondence etc.

Please do not let her get away with this.

As I have stated either overtly or subtly over the past 10 years to my complaints to your office, there is a network of highly Zionist Jews in New York City that have acted in concert to make my life a living hell by bullying and intimidating me personally and professionally every chance they get.

They talk and plot and spread the word amongst themselves that I am their enemy stemming from my trip to Iran in 2006 sponsored by Network 20/20 in New York, after which I wrote a field report advocating peaceful negotiations with Iran to disarm, and to pursue peace without colonialism and a respect for their people and culture.

After this report issued in 2007 these Zionist Jews, working in their jobs all over New York City (judges, restaurant and club owners, landlords, etc) have acted in concert to derail, sabotage, evict, blacklist, harass, threaten, and ruin my personal and professional life.

The latest episode stems from Brigitte Becquet, Manager at my office space located at ServCorp, at 17 State Street, Suite 4000, New York NY 10004 who has been doing her best to harass and drive me out of that office space, to once again destabilize me and my law practice, like they have been doing for nearly 10 years using their agents and proxies.

I had a complaint with the NYS Division of Human Rights in complaint no 10179302 alleging very specific instances of vicious racism and discrimination against me and my clients in my day to day law firm activities, but Brigitte Becquet told me she was sorry and would give me a credit and would renew my service/lease agreement at the end of this month, January 2016, if I would withdraw that complaint.

So I trusted her and withdrew my complaints with Norma Culajay, supervisor over at the NYSDHR.

Not less than 48 hours later Brigitte Becquet sent me an email terminating my service contract and told me it was because my complaints were "harassment" and that she had every right to throw me out of my office space because of this, without warning, and without notice.

I have of course requested that Norma Culajay at the NYSDHR reinstate my complaint, and also charge Brigitte Becquet with Retaliation for filing that complaint and asserting my human rights.

This abrupt cancellation of my office service agreement and non-renewal of course will further devastate my already struggling law practice that I have been struggling to keep rebuilding after these Zionist Jews and their agents/proxies have been destroying my life systematically in New York City since 2007, and are now forcing me into bankruptcy all over again.

Please investigate and advise.